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PM

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cc: Skip Matthews <mtc@mchsi.com>, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc:
Subject: Environmental Defense comments on Diethylhydroxylamine (CAS# 37 1 O-84-7)

(Submitted via Internet 6/7/06 to _____ and ann.tveit @ arkemaaroup.com)

Environmental Defense appreciates this opportunity to submit comments on the summary/test plan for **Diethylhydroxylamine (CAS# 371 O-84-7).**

Arkema Inc., in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for diethylhydroxylamine.

Diethylhydroxylamine is produced and used in very significant quantities; however, the test plan provides minimal information regarding its production, uses, transport or potential for environmental, occupational or consumer exposure.

Required SIDS elements are discussed minimally in the test plan and information regarding valid studies addressing these elements is gleaned only with difficulty from the IUCLID database files that constitute the robust summaries. Additional studies are proposed to address SIDS requirements for acute toxicity to fish and algal growth inhibition; however, we question the quality of some of the data described to address other SIDS elements.

According to a note on the test plan matrix summarizing available data and planned testing, only studies meeting the reliability criteria of "1" (reliable without restrictions) or "2" (reliable with restrictions) were used to fulfill the required SIDS elements. The IUCLID document that serves as robust summaries in this submission is said to contain "additional data". We would point out that much of the "additional data" are considered invalid and thus serve little purpose. Invalid studies include several addressing acute and chronic toxicity, mutagenicity, and reproductive toxicity. We did not find a valid study of reproductive toxicity. The test plan states that data to address reproductive toxicity can be obtained from the 28-day repeated dose study. We would defer judgment of the quality of those data to address this SIDS element to the EPA.

Other notes:

1. The term "short-stopping Agent" should be explained in the paragraph describing uses of diethylhydroxyl amine.

2. This submission should include the structural formula of diethylhydroxylamine.
3. Diethylhydroxylamine is also known by several synonyms that are not provided in this submission, but should be.
4. A repeated dose toxicity study in the robust summaries is said to have used doses up to 150 ppm. Adverse effects observed at that dose are described. Thus, it appears inconsistent that the NOEL in this study is concluded to be 150 ppm.

Summary: We do not think the present submission should be accepted until the IUCLID database files are edited to remove the numerous invalid studies, and the valid studies are judged adequate to address the required SIDS elements.

Thank you for this opportunity to comment.

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